

STEVEN MARK KAMP (California State Bar Number 116817)
STEVEN KAMP LAW OFFICE, 22 Petrilli Circle, Sacramento, CA 95822
Electronic Mail Address: steve.kamp@comcast.net
Telephone: (916) 501-1791 (cellular, voice/text)
Attorney for Plaintiff Ms. Parvin Olfati

PORTER SCOTT, A PROFESSIONAL CORPORATION

Carl L. Fessenden, SBN 161494

cfessenden@porterscott.com

Suli A. Mastorakos, SBN 330383

smastorakos@porterscott.com

2180 Harvard Street, Suite 500

Sacramento, California 95815

TEL: 916.929.1481

FAX: 916.927.3706

Attorneys for Defendants

COUNTY OF SACRAMENTO, PAMELA PISANI, JENNIFER REIMAN, JENNIFER STEWART, and SHERIFF'S SERGEANT RONALD BRIGGS

Exempt from Filing Fees Pursuant to Government Code § 6103

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

Ms. PARVIN OLFATI, Plaintiff,

v.

COUNTY OF SACRAMENTO et al.,
Defendants.

No. 2:22-CV-01127-KJM-JDP

**JOINT MOTION TO MODIFY ECF 23
SCHEDULING ORDER TO EXTEND
DISPOSITIVE MOTION HEARING
DEADLINE FROM 2024 AUGUST 9 TO
2024 NOVEMBER 29**

Hearing Date: July 12, 2024

Hearing Time: 10:00 a.m.

Courtroom: 3, 15th floor

Judge: Hon. Kimberley J. Mueller

Pursuant to Federal Rules of Civil Procedure Rule 16(b)(4) ("Rule") and Eastern District of California Local Rule ("L.R.") 230, Plaintiff Ms. Parvin Olfati ("Plaintiff") and Defendants County of Sacramento, Pamela Pisani, Jennifer Reiman, Jennifer Stewart and Sheriff's Sergeant Ronald

JOINT MOTION OF PLAINTIFF AND COUNTY OF SACRAMENTO DEFENDANTS TO MOVE
THE ECF 23 DISPOSITIVE MOTION HEARING DEADLINE FROM 2024 AUGUST 9 TO 2024
NOVEMBER 29 page 1

1 Briggs (“County Defendants”) hereby jointly move the Court to modify the ECF 23 Scheduling
2 Conference Minutes order to move the disposition motion hearing deadline from August 9, 2024 to
3 November 29, 2024.

4 Good cause under Rule 16(b)(4) exists for this Motion, as follows:

5 1. The parties in this action (Plaintiff and the County Defendants) are currently
6 involved in meet and confer regarding various responses by County Defendants to Plaintiff’s written
7 discovery requests. The parties are attempting to resolve all disputes by the June 17, 2024, discovery
8 deadline. Under the list of available civil hearing dates on the Court’s website, the available hearing
9 date closest to August 9 is August 2; under the 35-day clock in L.R. 230, motions and supporting
10 papers would need to be filed on June 27, 2024, ten days after the discovery cut-off date.

11 2. Also, Plaintiff has filed a California Public Records Act (CPRA) Petition for Writ
12 of Mandate against the County of Sacramento in the Superior Court of California, County of
13 Sacramento, Case No. 34-2021-00310164, *Parvin Olfati vs. County of Sacramento et al.* The matter
14 is set for hearing on June 10, 2024. There is extensive briefing related to the writ petition, which
15 the parties are currently engaged in. The briefing is anticipated to conclude on or about May 28,
16 2024. In addition, Petitioner Ms. Olfati has additional CPRA Requests that she and the County
17 Respondents are discussing including in a second hearing after June 10, 2024.

18 3. Further, Defendants’ counsel will be out of the United States on pre-paid vacations
19 during June 7-24, 2024, and during July 5-25, 2024, respectively. In addition, County Defendants’
20 counsel have a trial scheduled to start the first week of August.

21 4. Plaintiff through her undersigned counsel has the following matters pending in this
22 Court other than this action, or in the Sacramento County Superior Court (other than the above-
23 mentioned 34-2021-00310164):

24 (a) E.D. Cal. Case No. 2:21-cv-00606 CKD, *Parvin Olfati vs. City of Sacramento et*
25 *al.*, partial summary judgment in favor of Plaintiff on March 27, 2024 in ECF 209;
26 pre-trial conference and trial expected.

(b) E.D.Cal. Case No. 2:23-cv-02547 JDP, *Parvin Olfati vs. City of Sacramento et al.*, filed November 6, 2023; City of Sacramento has answered the Complaint; four Conspirator Defendants have filed Rule 12(b)(6) motions not yet ruled upon.

(c) Sacramento County Superior Court Case 23WM000031, *Parvin Olfati vs. City of Sacramento et al.* – May 24, 2024 hearings on prevailing party Petitioner's motion for attorney's fees and motion for supplemental writ of mandate.

(d) July 12, 2024 Sacramento County Superior Court hearings on:

(i) *Steven Maviglio vs. Parvin Olfati*, Case No. 34-2019-70006336

(ii) *Thomas Jameson O'Brien vs. Parvin Olfati*, Case No. 23CH001493

(iii) *Thomas James O'Brien vs. Parvin Olfati*, Case No. 24CH000169

(iv) *Parvin Olfati vs. Thomas James O'Brien*, Case No. 24CH000378

Accordingly, the parties respectfully request that the Court extend the dispositive motion filing deadline by 112 calendar days from the ECF 23 date of August 9, 2024 to November 29, 2024, in order to provide the parties sufficient time to prepare their respective dispositive motions and supporting documents, which are anticipated to be extensive in light of the number of claims asserted by Plaintiff in this lawsuit, and the County Defendants' defenses.

Respectfully submitted May 10, 2024, by:

/s/

May 9, 2024 by Steven Mark Kamp, Attorney for Plaintiff Ms. Parvin Olfati
State Bar of California Number 116817; Steven Kamp Law Office, 22 Petrilli Circle, Sacramento, California 95822 Electronic mail address: steve.kamp@comcast.net Telephone: (916) 501-1791 (cellular, voice/text)

/s/ Suli Mastorakos, Esq. (Authorized on 5/10/2024)

/s/ Carl Fessenden, Esq. (Authorized on 5/10/2024)

PORTER SCOTT APC, 2180 Harvard Street, Suite 500, Sacramento, CA 95815

Attorneys for Defendants

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ORDER

Good cause appearing and pursuant to the parties' joint motion, the court extends the deadline to hear dispositive motions from August 9, 2024 to November 29, 2024 at 10:00 A.M.

IT IS SO ORDERED.

DATED: May 31, 2024.



CHIEF UNITED STATES DISTRICT JUDGE